

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**MARC THOMIS and  
CHARLES ROBERTS**

**Plaintiffs,**

**v.**

**BRAZIL AMAZON TRADING, INC.,  
BRAZIL AMAZON RESOURCES, INC.,  
AND BRUNILDA OBUHOSKY,  
Individually**

**Defendants.**

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**Civil Action No.:  
1:05-CV-11812-WGY**

**ALEXANDER FUREY, ESQ.'S MOTION TO WITHDRAW AS  
COUNSEL FOR DEFENDANTS BRAZIL AMAZON TRADING, INC.,  
BRAZIL AMAZON RESOURCES, INC., AND BRUNILDA OBUHOSKY**

In accordance with Mass. R. Prof. C. 1.16, I, Alexander Furey, Esq. hereby request leave from this Court to withdraw as counsel for Defendants Brazil Amazon Trading, Inc., Brazil Amazon Resources, Inc. and Brunilda Obuhosky (collectively "Defendants"). As grounds for this Motion, I hereby state as follows:

1. I filed a notice of appearance on behalf of Defendants on or about November 18, 2005.
2. Defendants have failed to fulfill their financial obligations to my firm, Furey & Associates LLC, with respect to legal services which I have provided which has resulted in a substantial financial burden.
3. The Defendants will not suffer any prejudice if the Court grants this Motion. Pursuant to the Court's scheduling order, the deadline for discovery is set for March 15, 2007.

4. On January 26, 2006 I served written discovery on the Plaintiffs and noticed their depositions for early March 2007.

5. There are no motions pending before the Court and a trial date has not yet been set. Defendants have ample time and opportunity to retain replacement counsel.

6. In accordance with Mass. R. Prof. C. 1.16, Defendants have been provided with reasonable (14 days) warning that unless they fulfill their financial obligations, I intend to withdraw as their attorney. I have also repeatedly instructed Defendants that I intend to withdraw and to seek replacement counsel.

WHEREFORE, in accordance with Mass. R. Prof. C. 1.16, I, Alexander Furey, Esq. hereby requests that the Court grant me leave to withdraw as counsel for Defendants Brazil Amazon Trading, Inc., Brazil Amazon Resources, Inc. and Brunilda Obuhosky.

Respectfully submitted by Defendants,

**BRAZIL AMAZON TRADING, INC.,  
BRAZIL AMAZON RESOURCES, INC.  
and BRUNILDA OBUHOSKY, Individually**

By their attorney,

/s/ Alexander Furey

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Fax 617-573-5115

DATED: January 31, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above-referenced Motion was served on counsel for Plaintiffs via the Court's electronic filing system.

/s/ Alexander Furey

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Alexander Furey, Esq.